



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

February 13, 2018

Honorable Katherine B. Forrest  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**RE: *United States v. Razhden Shulaya, 17 Cr. 350 (KBF)***

Dear Judge Forrest:

The Government writes to request that the Court convene a conference to explore the possibility of a conflict as between the defendant, Razhden Shulaya, and his currently retained counsel and Court-appointed stand-by counsel. The Government recently became aware of the existence of a website, *razhdenshulaya.com*, which focuses on Shulaya's prosecution in this case. Among the statements on the website are derogatory complaints regarding Shulaya's current legal team.<sup>1</sup> To avoid a belated request for adjournment of the current trial schedule in the event that a conflict exists as between Shulaya and his counsel, the Government respectfully requests that the Court convene a conference at which the Court can explore, on the record, any potential or actual conflicts in light of the content of this website.<sup>2</sup>

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

by: /s/ Andrew C. Adams  
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<sup>1</sup> In particular, the website currently contains the following statements: 1) "His current CJA attorney has no motives or interest on the case as well as another attorney who seems to take money and vanish. We can't get to know the case because the defense team still didn't provide any discovery in Russian to Razhden of why he has been held in a Federal Jail"; and 2) "We do not hire unlicensed, unprofessional scumbags, and thats who we were dealing with. So far, our attorney just take money and vanish with no work progress whatsoever. But even without defense team help, so much has been discovered."

<sup>2</sup> The Government continues to investigate the ownership and authorship of the content *razhdenshulaya.com*, and currently takes no position as to whether Shulaya himself published or approved any of that content. p